

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE DYNAGAS LNG PARTNERS LP
SECURITIES LITIGATION

No. 1:19-cv-04512 (AJN)

**DECLARATION OF ANDREW J. ENTWISTLE IN SUPPORT OF
PLAINTIFFS' MOTION FOR PRELIMINARY APPROVAL OF SETTLEMENT,
APPROVAL OF FORM OF CLASS NOTICE, AND A HEARING DATE FOR FINAL
APPROVAL OF SETTLEMENT**

I, ANDREW J. ENTWISTLE, hereby declare:

1. I am a partner at the law firm of Entwistle & Cappucci LLP, counsel for Plaintiffs and Court-appointed Lead Counsel. I am admitted to practice before this Court.

2. I respectfully submit this declaration in support of *Lead Plaintiffs' Motion for Preliminary Approval of Settlement, Approval of Form of Class Notice, and A Hearing Date for Final Approval of Settlement*.

3. The settlement is the result of extensive arm's-length negotiations including two all-day mediation sessions before Hon. Jose L. Linares (Ret.) and a mediator's proposal that was accepted by the Parties. In my judgment, it represents an excellent recovery on behalf of the Settlement Class, and I recommend its approval.

4. Attached hereto as Exhibit A is a copy of the *curriculum vitae* of Michael A. Marek, the expert economist who assisted Plaintiffs in developing the proposed Plan of Allocation.

5. Attached hereto as Exhibit B is a copy of LAARNI T. BULAN AND LAURA E. SIMMONS, SECURITIES CLASS ACTION SETTLEMENTS - 2019 REVIEW AND ANALYSIS, available at <https://www.cornerstone.com/Publications/Reports/Securities-Class-Action-Settlements-2019-Review-and-Analysis>, retrieved May 20, 2021.

6. Attached hereto as Exhibit C is a calculation of simplified tiered damages, based on the allegations of the Complaint and publicly available data regarding the market for Dynagas securities, prepared with the assistance of Plaintiffs' expert economist, Mr. Marek.

7. With respect to the Claims Administrator charged with facilitating the distribution of settlement funds pursuant to the Plan of Allocation, I recommend that A.B. Data, Ltd. ("A.B. Data") be appointed as the Claims Administrator for the Settlement. Lead Counsel selected A.B. Data after reviewing the available options and undertaking a rigorous bidding process consisting of soliciting written bids from three leading complex securities administrators.

8. A.B. Data has been in the business of administering class action settlement for years and has administered hundreds of class action settlements, including some of the most notable securities matters involving an array of complex financial instruments. A.B. Data has substantial experience in carrying out class action notice and payment projects, and has handled the administration of numerous complex, data-driven settlements. A.B. Data's Firm Resume is attached hereto as Exhibit D.

9. In connection with negotiations with Lead Counsel, A.B. Data has agreed to cap the initial costs of notice and administration through the initial distribution at \$195,000, excluding broker fulfilment costs and extraordinary circumstances (*e.g.*, Court-ordered re-noticing of the Settlement Class).

Dated: May 21, 2021
Austin, Texas

/s/ Andrew J. Entwistle
Andrew J. Entwistle